

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

<b>IN RE</b>  <b>SHARON MARIE WILKINS,</b>  <b>Debtor</b>	Chapter 13  Case Number: 23-10966-amc  Judge: Hon. ASHELY M. CHAN
---	---

**RESPONSE TO DEBTOR'S AMENDED OBJECTION OF CALVARY SPV I, LLC  
PROOF OF CLAIM NO. 7**

CALVARY SPV I, LLC (hereinafter referred to as the "Calvary SPV I"), by and through its attorneys, Maurice Wutscher, LLP, and for its response to Debtor's Amended Objection to Proof of Claim No. 7 and states as follows:

1. Admit.
2. Admit.
3. Admit.
4. Denied. As the Debtor has failed to provide adequate information in the statement.
5. Admit.
6. The respondent realleges and reavers the allegations said forth in paragraphs 1 through 5 as though fully rewritten herein.
7. Denied. The document complies with the Federal Rule of Bankruptcy Procedure 3001 as evidenced by the Proof of Claim filed with the Court.
8. Admit. Respondent admits that the documents were requested and that the respondent provided all documents requested which complied with Rule 3001 of the Federal Rules of Bankruptcy Procedure.
9. Admit.

10. Denied. The contract provided by the respondent complies with the Rule 3001 of the Federal Rules of Bankruptcy Procedure and State law.

a. Denied. The proof of claim filed with the court and the additional documents provided to debtors' counsel validate the respondent's claim under 11 U.S.C. Section 502 while complying with the requirements of Federal Rule of Bankruptcy Procedure 3001.

b. Denied. The proof of claim filed with the court and the additional documents provided to debtors' counsel validate the respondent's claim under 11 U.S.C. Section 502 while complying with the requirements of Federal Rule of Bankruptcy Procedure 3001.

c. Denied. The proof of claim filed with the court and the additional documents provided to debtors' counsel validate the respondent's claim under 11 U.S.C. Section 502 while complying with the requirements of Federal Rule of Bankruptcy Procedure 3001.

d. Denied. The proof of claim filed with the court and the additional documents provided to debtors' counsel validate the respondent's claim under 11 U.S.C. Section 502 while complying with the requirements of Federal Rule of Bankruptcy Procedure 3001.

11. Denied. A fact sheet was sent but the date of the fact sheet and the full Debtor information.

a. Denied. The proof of claim filed with the court and the additional documents provided to debtors' counsel validate the respondent's claim under 11 U.S.C.

Section 502 while complying with the requirements of Federal Rule of Bankruptcy Procedure 3001.

- b. Denied. The proof of claim filed with the court and the additional documents provided to debtors' counsel validate the respondent's claim under 11 U.S.C. Section 502 while complying with the requirements of Federal Rule of Bankruptcy Procedure 3001.
  - c. Denied. The proof of claim filed with the court and the additional documents provided to debtors' counsel validate the respondent's claim under 11 U.S.C. Section 502 while complying with the requirements of Federal Rule of Bankruptcy Procedure 3001.
  - d. Denied. The proof of claim filed with the court and the additional documents provided to debtors' counsel validate the respondent's claim under 11 U.S.C. Section 502 while complying with the requirements of Federal Rule of Bankruptcy Procedure 3001.
  - e. Denied. The proof of claim filed with the court and the additional documents provided to debtors' counsel validate the respondent's claim under 11 U.S.C. Section 502 while complying with the requirements of Federal Rule of Bankruptcy Procedure 3001.
12. Denied.
13. Denied. Said allegations request a legal conclusion. Without waiving its objection the documents provided by the respondents comply with Federal Rule of Bankruptcy Procedure 3001.

14. Denied. Cavalry has a valid claim in the amount of \$2,920.22 pursuant to 11 U.S.C Section 502.

15. The respondent realleges and reavers the allegations said forth in paragraphs 1 through 14 as though fully rewritten herein.

16. Denied. The documents provided to Debtor's counsel as well as the Bill of Sale Assignment, Account Summary and Account Statement attached to the proof of claim are sufficient to show the assignment.

17. Denied. The documents provided to Debtor's counsel as well as the Bill of Sale Assignment, Account Summary and Account Statement attached to the proof of claim are sufficient to show the assignment.

18. Denied. This allegation calls for a legal conclusion without waiving its objection, the documents comply with Federal Rule of Bankruptcy Procedure 3001.

19. Denied.

WHEREFORE, CALVARY SPV I, LLC respectfully requests this Court to overrule the Debtor's amended objection to claim and find that Calvary SPV I, LLC has a valid proof of claim pursuant to 11 U.S.C. Section 502 in the amount of \$29,20.22.

Respectfully submitted,

MAURICE WUTSCHER, LLP

By **/s/ Thomas R. Dominczyk**

Thomas R. Dominczyk, Esq.

PA Attorney ID: 85248

5 Walter E. Foran Blvd., Suite 2007

Flemington, NJ 08822

(908) 237-4550

(908) 237-4551 fax

[tdominczyk@mauricewutscher.com](mailto:tdominczyk@mauricewutscher.com)

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

<b>IN RE</b>	Chapter 13
<b>SHARON MARIE WILKINS,</b>	Case Number: 23-10966-amc
<b>Debtor</b>	Judge: Hon. ASHELY M. CHAN

**CERTIFICATE OF SERVICE**

I, THOMAS R. DOMINCZYK, ESQUIRE, hereby certify that on this date I have caused a true and correct copy of the foregoing of CALVARY SPV I, LLC'S Response to Debtor's Amended Objection to Proof of Claim No. 7, by United States first class mail, postage pre-paid or via electronic filing upon:

VICKY ANN PIONTEK, ESQ.  
58 EAST FRONT STREET  
DANVILLE, PA 17821

SCOTT F. WATERMAN, TRUSTEE  
2901 ST. LAWRENCE AVEUE, SUITE  
100  
READING, PA 19606

UNITED STATES TRUSTEE  
OFFICE OF THE UNITED STATES  
TRUSTEE  
ROBERT N.C. NIX FEDERAL BUILDING  
900 MARKET STREET, SUITE 320  
PHILADEPHIA, PA 19107

MAURICE WUTSCHER, LLP

By **/s/ Thomas R. Dominczyk**  
Thomas R. Dominczyk, Esq.  
PA Attorney ID: 85248  
5 Walter E. Foran Blvd., Suite 2007  
Flemington, NJ 08822  
(908) 237-4550  
(908) 237-4551 fax  
[tdominczyk@mauricewutscher.com](mailto:tdominczyk@mauricewutscher.com)

DATE: September 13, 2023

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

<b>IN RE</b>  <b>SHARON MARIE WILKINS,</b>  <b>Debtor</b>	Chapter 13  Case Number: 23-10966-amc  Judge: Hon. ASHELY M. CHAN
---	---

**ORDER**

Upon consideration of CALVARY SPV I, LLC'S Response to Debtor's Amended Objection to Proof of Claim No. 7 dated August 9, 2023, it is ORDERED that the Debtor's Amended Objection to Proof of Claim No. 7 is denied.